

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEATHERMAN TOOL GROUP, INC.,

Plaintiff,

v.

SHOP1102814120 STORE, et al.,

Defendants.

Case No. 24-cv-00088

Judge Sunil R. Harjani

Magistrate Judge Jeffrey Cole

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT
AGAINST REMAINING DEFENDANT LUELIAOB**

Plaintiff Leatherman Tool Group, Inc. ("Plaintiff"), by its counsel, moves this Honorable Court to enter Default and Default Judgment against the only Defendant remaining in this case, Defendant LueLiaoB (Defendant No. 44).¹ In support of this Motion, Plaintiff submits the accompanying Memorandum and a further Declaration of Justin R. Gaudio.

¹ On March 21, 2024, the Court granted Plaintiff's Motion for Entry of Default and Default Judgment Against the Defendants Identified on Schedule A with the Exception of Defendants Awaiymi Dekeliy US (Def. No. 10), ChenCanMaoYi (Def. No. 14), Feidudu (Def. No. 19), GZTFPQ (Def. No. 24), LueLiaoB (Def. No. 44), and Enjoy guest home (Def. No. 119). *See* [40], [48], and [49]. Defendant Nos. 10, 14, 19, 24, and 119 have since been dismissed from this case. [53] [55]. Defendant No. 44 is the only remaining defendant in this case. Entry of a Final Judgment as to Defendant No. 44 will terminate this case.

Dated this 19th day of April 2024.

Respectfully submitted,

/s/ Kahlia R. Halpern

Amy C. Ziegler

Justin R. Gaudio

Kahlia R. Halpern

Luana Faria de Souza

Greer, Burns & Crain, Ltd.

300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606

312.360.0080

312.360.9315 (facsimile)

aziegler@gbc.law

jgaudio@gbc.law

khalpern@gbc.law

lfaria@gbc.law

Counsel for Plaintiff Leatherman Tool Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April 2024, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to the e-mail addresses identified in Exhibit A hereto that includes a link to said website.

/s/ Kahlia R. Halpern
Amy C. Ziegler
Justin R. Gaudio
Kahlia R. Halpern
Luana Faria de Souza
Greer, Burns & Crain, Ltd.
300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
312.360.0080
312.360.9315 (facsimile)
aziegler@gbc.law
jgaudio@gbc.law
khalpern@gbc.law
lfaria@gbc.law

Counsel for Plaintiff Leatherman Tool Group, Inc.